

EXHIBIT E

DECLARATION


I, Donna McCallum, hereby declare under penalty of perjury under the laws of the State of California that the following statements are true to the best of my knowledge and belief:

1. I am the Section Chief for the Clinical Laboratory Improvement Amendment (CLIA) Section for the California Department of Public Health's Laboratory Field Services (LFS). I have knowledge of the facts stated herein.
2. The mission of LFS is to ensure quality standards in clinical and public health laboratories through certification, examination, inspection, education and proficiency testing. Among other things, LFS is responsible for the enforcement of state and federal laws governing clinical laboratories in the State of California.
3. Federal Centers for Medicare and Medicaid services (CMS) documents in the custody of LFS regarding the 2013 CLIA survey of Theranos consist of the following:
 - a. Survey Tracking Form
 - b. Form CMS-1539
 - c. Form CMS-209
 - d. Form CMS-1557
 - e. Theranos Updated Form CMS-2567, dated 1/17/13
 - f. Form CMS-670
 - g. Notice of Standard-Level Deficiencies, dated 12/10/13
 - h. Form CMS-116
4. To my knowledge, notes from the LFS CLIA Section surveyor's 2013 routine CLIA survey of Theranos are no longer available.
5. To my knowledge, there are no internal communications or written communications with CMS regarding the 2013 CLIA survey as it was a routine survey.
6. LFS has initiated an email search to verify that no email communications with CMS regarding the routine 2013 CLIA survey of Theranos exist and will confirm with CMS once the search inquiry is completed.

I declare under penalty of perjury that the foregoing is true and correct.



Declarant Signature



Date